Remarks/Arguments:

Claims 1-5 are pending. Claims 1-5 stand rejected.

Rejections under 35 U.S.C. §103

The Office Action at page 2, paragraph 2 sets forth "Claims 1 and 4-5 are rejected under 35 U.S.C. 103(a) as being unpatentable over *White*'98 . . . by itself, or in the alternative, in view of the SyJet drivers [reference]." Applicant respectfully submits that this rejection is overcome by the amendments to the claims for the reasons set forth below.

Applicant's invention, as recited in claim 1 (as amended), includes features which are neither disclosed nor suggested by White and/or the SyJet driver's reference, namely:

> . . . allocating drive letters in number equal to a number of plural
> drives to a single unit of said removable device, when said device
> driver allocates drive letters to said operating system when said
> removable media is both loaded in and unloaded from said removable
> device. (emphasis added)

These features are described in Applicant's Specification, for example, at page 5, line 12 through page 6, line 18.

According to claim 1, drive letters are allocated in a number equal to the number of plural drives to a single unit of the removable device, when the removable device allocates drive letters to the operating system when the removable media is both loaded in and unloaded from the removable device.

White'98 is relied upon as disclosing "reserving (that is 'allocating') multiple drive letters for a single cartridge. According to *White*'98 '[i]f you insert a cartridge with one partition [into the SyJet after having reserved the letter range S: to U:], it will be [assigned letter] S:; [a] 2-partition cartridge will be [assigned the letters] S: and T:.'" (Emphasis added) There is absolutely no disclosure or suggestion in *White*'98, however, of allocating drive letters to the operating system when the removable media is both loaded in and unloaded from the removable device. On the contrary, the allocation of drive letters to the removable media requires that the removable media be inserted into the removable device.

Page 3

The SyJet reference discloses that "the OS should identify the [removable] device upon boot up and assign it a drive letter." There is no disclosure or suggestion, however, in the SyJet reference of allocating drive letters when the removable media is both loaded in and unloaded from the removable device. Thus, the SyJet reference fails to make up for the deficiencies of the *White*'98 reference.

By contrast, Applicant's invention, as recited in claim 1, specifies that drive letters are allocated in number equal to the number of plural drives to a single unit of the removable device such that the device driver allocates drive letters to the operating system when the removable media is both loaded in and unloaded from the removable device.

It is because Applicant has included the features of allocating drive letters in number equal to a number of plural devices to a single unit of the removable device such that the device driver allocates drive letters to the operating system when the removable media is both loaded in and unloaded from the removable device that Applicant is able to dynamically change drive letters each time the removable medium is replaced. *White*'98 and the SyJet reference do not achieve this advantage because each of these references require that the computer either be restarted or the partitions be set in a hard configuration upon set up of the computer system.

For the reasons set forth above, claim 1 is neither disclosed nor suggested by *White*'98 and/or the SyJet reference, thus, claim 1 is not subject to rejection under 35 U.S.C. §103(a) as being unpatentable over *White*'98 either alone or in combination with the SyJet reference. Applicant therefore respectfully requests that the rejection of claim 1 be withdrawn and the claim allowed.

Claims 4-5 depend upon claim 1 and, thus, are likewise not subject to rejection for at least the reasons set forth above with respect to claim 1.

The Office Action at page 4, paragraph 3, sets forth "Claims 2-3 are rejected under 35 U.S.C. 103(a) as being unpatentable over White'98 ... by itself, or in the alternative, in view of SyJet drivers [reference] ... and further in view of Bruss ...." Applicant respectfully submits that this rejection is overcome by the amendments to the claims for the reasons set forth below.
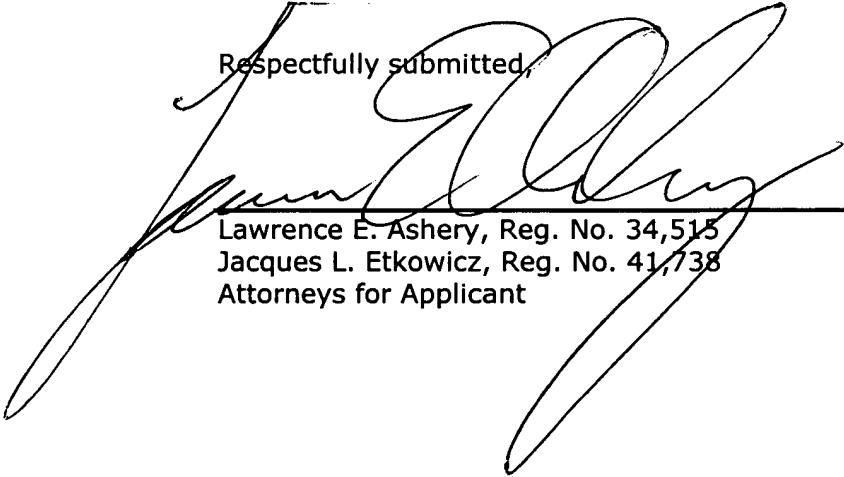
Bruss is relied upon as "[disclosing] that the maximum number of DOS-type partitions one can have on a hard drive is 24." Office Action at page 5. Bruss does not disclose or suggest, however, allocating drive letters to the operating system when the removable media is both loaded in and unloaded from the removable device. Thus, Bruss fails to make up for the deficiencies of both White'98 and the SyJet drivers references. Therefore, as the combination of White'98, SyJet drivers and Bruss, in any combination, do not include all features of applicant's claim 1, from which claims 2-3 depend, applicant respectfully requests that the rejection be withdrawn and the claims allowed.

In view of the amendments and remarks set forth above, the above-identified Application is in condition for allowance which action is respectfully requested.

Respectfully submitted,

Lawrence E. Ashery, Reg. No. 34,515
Jacques L. Etkowicz, Reg. No. 41,738
Attorneys for Applicant

LEA/JLE/ds

Dated: May 6, 2003

P.O. Box 980
Valley Forge, PA 19482-0980
(610) 407-0700

The Assistant Commissioner for Patents is hereby authorized to charge payment to Deposit Account No. **18-0350** of any fees associated with this communication.

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail, with sufficient postage, in an envelope addressed to: Assistant Commissioner for Patents, Washington, D.C. 20231 on:

May 6, 2003